

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

ML FASHION, LLC, and ML RETAIL,

Plaintiffs,

v.

NOBELLE, STEPHANIE MENKIN, SARIT
MAMAN NAGRANI, and NICOLAS
GOUREAU,

Defendants.

Case No. 1:20-cv-05124

Hon. Steven C. Seeger

AGREED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendants Stephanie Menkin (“Menkin”), Nicolas Goureau (“Goureau”), Sarit Maman Nagrani (“Nagrani”), and Nobelle GW LLC¹ (“Nobelle,” collectively, the “Defendants”), by and through their undersigned counsel, respectfully move this Court, unopposed, for an extension of time, up to and including October 26, 2020, to respond to Plaintiffs ML Fashion, LLC (“ML Fashion”) and ML Retail LLC’s (“ML Retail,” together the “Plaintiffs”) Complaint. In support of this Motion, the Defendants state as follows:

1. Plaintiffs filed their Complaint on August 31, 2020. (Dkt. 1.)
2. Plaintiffs effected service on Defendants Nagrani and Nobelle on September 4, 2020. (Dkt. Nos. 16 & 17.)
3. Defendants Nagrani and Nobelle’s responsive pleadings are currently due on or before September 25, 2020.

¹ Defendant Nobelle GW LLC was erroneously named as Nobelle in Plaintiffs’ Complaint.

4. On September 16, 2020, counsel for Defendants Menkin and Goureau agreed to accept service on their behalf in exchange for an extension of time to respond to the Complaint for all Defendants to and including October 26, 2020. (*See* Dkt. Nos. 24 & 25.)

5. Under Rule 6(b), this Court may extend the time for Defendants to file their responsive pleading for good cause. Fed. R. Civ. P. 6(b)(1)(A).

6. Here, there is good cause to extend Defendants' time to respond to the Complaint. Plaintiffs' Complaint includes nine causes of action, several theories of liability, and 135 paragraphs of allegations. In addition, as Defendants have already indicated, there are jurisdictional issues with Plaintiffs' Complaint.

7. Additionally, Plaintiffs have filed a Motion for a Temporary Restraining Order and Preliminary Injunction which Defendants had to respond to meaning they were unable to fully review and respond to the Complaint while opposing that motion.

8. As such, Defendants require additional time in which to further investigate and respond to the allegations of the Complaint.

9. Further, an extension of time is needed to bring all Defendants' responsive deadlines into alignment. Defendants believe that allowing all Defendants to respond to the complaint on the same timetable will streamline the proceedings, decrease costs for the parties, and conserve judicial resources.

10. There have not been any previous extensions of Defendants' deadline to respond to the Complaint.

11. Counsel for Defendants have conferred with Counsel for Plaintiffs concerning this motion, and Plaintiffs' counsel does not object to this request for an extension of time and has agreed to the requested response date of October 26, 2020.

12. None of the parties will be prejudiced if the requested extension is granted, nor will any substantial delay occur.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court grant this agreed motion for an extension of time and extend the deadline for the Defendants to respond to the Complaint to and including October 26, 2020.

Dated: September 17, 2020

/s/ Elizabeth L. Janczak

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CERTIFICATE OF SERVICE

I, Elizabeth L. Janczak, an attorney, hereby certify that on September 17, 2020, I caused a true and correct copy of the *Agreed Motion to Extend Time to Respond to Complaint*, to be filed with the Court and served upon the following parties by the manner listed.

/s/ Elizabeth L. Janczak

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